

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankr. No. 20-20081 JAD
RENEE R. KLINE,)
Debtor.) Chapter 13
WILMINGTON SAVINGS FUND)
SOCIETY,) Docket No. 66
Movant,) Related to Docket No.
vs.)
RENEE R. KLINE AND) Hearing Date & Time:
RONDA J. WINNECOUR,)
CHAPTER 13 TRUSTEE,)
Respondents.)
)

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Renee R. Kline , by and through her attorney, who respectfully represents the following:

1. On or about January 9, 2020, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Wilmington Savings Fund Society filed a Notice of Mortgage Payment Change. The monthly mortgage payment of **\$457.71** is being **increased** to **\$530.62** effective **12/1/2021**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Date: 11/5/2021

Respectfully submitted,

/s/ Rodney D. Shepherd

Rodney D. Shepherd, Esquire

Attorney for the Debtor

PA ID No. 56914

2403 Sidney Street

2105 51st
Suite 208

Suite 208
Pittsburgh PA 15203

Pittsburgh, PA
(412) 471-9670

(412) 471-9870
rodsheph@cs.com

CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 5th day of November, 2021, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecl@chapter13trusteewdpa.com

Wilmington Savings Fund Society
Attn: Charles G. Wohlrab, Esquire
cwohlrab@raslg.com

By: /s/ Rodney D. Shepherd
Rodney D. Shepherd
Attorney for the Debtor
PA I.D. No. 56914
rodsheph@cs.com
2403 Sidney Street
Suite 208
Pittsburgh, PA 15203
412 471-9670